

Oral Argument Requested

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JUSTIN SHERWOOD,

Plaintiff,

- against -

CITY OF NEW YORK, et al.

Defendants.

NOTICE OF MOTION TO
REMOVE
CONFIDENTIALITY
DESIGNATIONS AND
FOR RELATED RELIEF

22-cv-7505 (BMC)

PLEASE TAKE NOTICE that, upon the declaration of Gideon Oliver, sworn to on October 16, 2023 (and the accompanying exhibits), the accompanying Memorandum of Law, and all other pleadings and papers to date, Plaintiff respectfully moves this Court, at a time of the Court's convenience, for an Order:

- (1) Removing the "Confidential" designation from the records specified in Appendix 1 to the accompanying Memorandum of Law, pursuant to Paragraph 8 of ECF 60-1, as entered through the Court's June 5, 2023 Minute Order;
- (2) Awarding Plaintiff attorneys' fees related to this motion under Fed. R. Civ. P. 37 because Defendants' position is not substantially justified; and/or
- (3) granting any other relief the Court deems just and proper.

As noted above, Plaintiff requests oral argument.

PLEASE TAKE FURTHER NOTICE that, as directed by the Court in its September 28, 2023 Minute Order, any opposition to this motion is due on or before October 30, 2023, and any reply will be served on or before November 6, 2023.

DATED: October 16, 2023
 Brooklyn, New York

_____/s/_____
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